

1 The Rodriguez Law Group
2 Ambrosio E. Rodriguez, SBN 200880
3 626 Wilshire Blvd., Ste 460
4 Los Angeles, CA 90017
5 (213) 995-6767
6 (213) 995-6368
7 aer@aerlawgroup.com

8 Counsel for Defendant
9 Anthony David Flores

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ANTHONY FLORES

16 Defendant.

Case No. 2:22-CR-00593-PA

DEFENDANT ANTHONY FLORES'S
RESPONSE TO THE GOVERNMENTS
SENTENCING MEMORANDUM

CURRENT SENTENCING

DATE: 06/17/2024 at 1:30 p.m.

17 Defendant Anthony Flores ("defendant"), both individually and by
18 and through his counsel of record, Ambrosio E. Rodriguez, hereby
19 files this response to the governments sentencing memorandum.

20 **I. Dr. Sawusch was not isolated**

21 In its sentencing memorandum the government repeatedly claims
22 that Dr. Sawusch was isolated and continuously under the
23
24
25
26
27
28

1 the influence of marijuana, mushrooms, or lsd. The
2 photographs attached to this response labeled exhibit A are
3 evidence of what Dr. Sawusch's life was actually like with
4 Anthony Flores and Anna Moore. As the court can see from the
5 photographs, Dr. Sawusch's life with the defendants included
6 a lot of happiness and good times. These photographs show Dr
7 Sawusch in social events, surrounded by people, smiling at
8 dinner, enjoying a beach day with friends. In other words,
9 these pictures paint a much different picture of the reality
10 of Dr. Sawusch's life than the dark and lonely life presented
11 by the government.

12
13 The government sentencing memorandum fails to add that Dr.
14 Sawusch was under the care of two psychologists that he was
15 seeing on a weekly basis. He would meet with the
16 psychologists in a private setting and would enter into
17 therapy sessions. Neither of the psychologists ever reported
18 Anthony Flores as a threat to Dr. Sawusch. Moreover, Dr.
19 Sawusch during the times that are relevant to this case was
20 also under the care of a physician, one that Mr. Flores would
21 take for his medical appointments.

22 23 **II. Additional factor in mitigation**

24
25 Patricia Hinojos is the Defendants mother. She has been the
26 most supportive person in Anthony Flores' life. She is his
27 rock, and he is hers. Unfortunately, Ms. Hinojos suffers from
28

1 a terminal illness. Exhibit B is a letter from her Dr. at
2 Stanford university which provides information as to the
3 status of her deteriorating health and her ongoing
4 treatments. The 15-year sentence that the government requests
5 would not only be disproportionate to the crimes that Mr.
6 Flores committed, but it will also guarantee that Ms. Hinojos
7 passes without being able to see her son out of
8 incarceration. The defense humbly asks the court to take into
9 account Ms. Hinojos' health or lack of it when sentencing Mr.
10 Flores.

11 **III. Corrections**

12
13
14 After a review of the defense sentencing memorandum there are
15 two error that the defense wishes to correct. The first is on
16 page 6 line 21, that states that the victim received One
17 million dollars from the defendant in the civil litigation.
18 As it's clear in the other parts of the defense memorandum
19 and the governments memorandum the amount that was returned
20 to the victims was 2.1 million dollars. The second error is
21 that on page 9 line 15, it refers to Dr. Sawusch as a
22 billionaire, Dr. Sawusch was a millionaire not a billionaire.

23 //

24 //

25 //

26 //

27 //

1 //

2 //

3 //

4 //

5 //

6
7 Respectfully submitted this 14th day of June 2024.

8
9 /s/ Ambrosio E Rodriguez

10 Ambrosio E. Rodriguez

11 Attorney for Defendant